

The Honorable John H. Chun

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

P. POE 5 and P. POES 2-4 and 6-75,
individually and on behalf of others
similarly situated,

Plaintiffs,

v.

THE UNIVERSITY OF WASHINGTON, a
Washington public corporation; PERRY
TAPPER, Director of Public Records and
Open Public Meetings at the University of
Washington, in their official capacity,

Defendants,

and

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., a
Virginia nonstock corporation; and
NORTHWEST ANIMAL RIGHTS
NETWORK, a Washington nonprofit
corporation,

Intervenor-Defendants.

Case No. 2:24-cv-00170-JHC

**SUPPLEMENTAL DECLARATION
OF PETER D. HAWKES IN SUPPORT
OF INTERVENOR-DEFENDANTS'
RESPONSE TO PLAINTIFF'S
MOTION FOR PRELIMINARY
INJUNCTION**

I, Peter D. Hawkes, declare as follows:

1. I am one of the attorneys representing Intervenor-Defendants People for the Ethical Treatment of Animals, Inc. and Northwest Animal Rights Network in this action.

2. Attached as **Exhibit A** is a true and correct copy (with added highlighting) of excerpts from the transcript of the deposition of Dr. Jane Sullivan, taken on February 28, 2025 (the "Sullivan Deposition").

3. Attached as **Exhibit B** is a true and correct copy (with added highlighting) of a Slack chat thread produced by the University of Washington (“UW”) in this matter with Bates number UW-000138 and marked as Exhibit 2 in the Sullivan Deposition.

4. Attached as **Exhibit C** is a true and correct copy (with added highlighting) of an email and attachment produced by UW in this matter with Bates numbers UW-000046 to UW-000067 and marked as Exhibit 7 in the Sullivan Deposition

5. Attached as **Exhibit D** is a true and correct copy (with added highlighting) of a Slack chat thread produced by UW in this matter with Bates number UW-000139 and marked as Exhibit 3 in the Sullivan Deposition.

6. Attached as **Exhibit E** is a true and correct copy (with added highlighting) of a Slack chat thread produced by UW in this matter with Bates number UW-000147 and marked as Exhibit 8 in the Sullivan Deposition.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 17th day of March 2025.

s/Peter D. Hawkes

Peter D. Hawkes